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March 31, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

Pursuant to the Court's Order, Dkt. No. 37, I write on behalf of all parties to provide the Court with a status report regarding the parties' progress in resolving the two Freedom of Information Act ("FOIA") requests, dated October 1, 2021 and February 25, 2022, as to defendants U.S. Department of Homeland Security ("DHS"), U.S. Customs and Border Protection ("CBP"), and U.S. Immigration and Customs Enforcement ("ICE") (collectively, the "DHS Defendants" or the "Government").

When the parties last submitted a letter to this Court on March 2, 2023, Dkt. No. 36, they noted that Plaintiffs had provided a search plan to the DHS Defendants on February 10, 2023. The parties then met and conferred on March 7, 2023. The DHS Defendants provided a substantive response to Plaintiffs' search plan yesterday, March 30, 2023. Plaintiffs are considering the proposals contained in that response, and the parties have committed to conferring substantively and in good faith as needed next week in order to facilitate a resolution by April 14. In addition, counsel for the Government have committed to conferring with defendant CBP to propose a production schedule for the February 25, 2022 FOIA Request and the agreed-upon portions of the October 1, 2021 FOIA Request by April 7, 2023. Counsel for the Government have also informed Plaintiffs that defendant DHS has begun processing the February 25, 2022 FOIA Request, and should complete its processing and production of non-exempt records, or portions thereof, if any, in approximately two months.

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The parties thus respectfully propose that they submit another joint letter to the Court by April 14, 2023, regarding whether the remaining issues have been resolved or if the Court's intervention is required because the parties have not been able to reach agreement.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Sara Fatima Dhanji

Stephen J. Fuzesi (Bar No. SF2000)

Sara Fatima Dhanji (*pro hac vice*)

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